

1 MICHAEL J. HADDAD (State Bar No. 189114)
2 JULIA SHERWIN (State Bar No. 189268)
3 GINA ALTOMARE (State Bar No. 273099)
4 GENEVIEVE K. GUERTIN (State Bar No. 262479)
5 HADDAD & SHERWIN
6 505 Seventeenth Street
7 Oakland, California 94612
8 Telephone: (510) 452-5500
9 Fax: (510) 452-5510

10 Attorneys for Plaintiff
11 PETER DIXON

12
13 **UNITED STATES DISTRICT COURT**
14
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 PETER DIXON individually,)

17 Plaintiff,)

18 vs.)

19 CITY OF OAKLAND and the)
20 OAKLAND POLICE DEPARTMENT,)
21 public entities, SERGEANT BERNARD)
22 ORTIZ, OFFICER STEVEN TORIBIO,)
23 OFFICER PATRICK GERRANS,)
24 OFFICER ROBERT GERRANS,)
25 OFFICER R. GARCIA, PERSONAL)
26 PROTECTIVE SERVICES, INC., a)
27 California corporation, DEMONT)
28 MARROW, STANLEY TEETS,)
MEREDITH WILSON, RENE GARCIA,)
LADALE SLOCUM and DOES 5)
through 10, individually, jointly and)
severally,)

29 Defendants.

Case No. C12-5207 DMR

**STIPULATION AND (PROPOSED)
ORDER TO CONTINUE SETTLEMENT
CONFERENCE**

30
31 ALL PARTIES, THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY
32 STIPULATE, AND REQUEST THIS COURT TO ORDER, THAT the settlement conference

1 currently scheduled before Magistrate Judge Cousins for September 12, 2013 at 9:30 a.m. be
 2 rescheduled to December 17, 2013. The reason for this requested continuance is that, in the
 3 parties' estimation, the case is not in a settlement posture due to discovery that remains to be
 4 completed.

5 Plaintiff has not yet had an opportunity to depose the individual defendants in this matter.
 6 These depositions are currently scheduled to occur during early to mid-September. Additionally,
 7 Defendants have not yet deposed Plaintiff. The parties anticipate these depositions will be
 8 completed by December 2013 and that they will then be in a position to evaluate this case for
 9 settlement.
 10

11
 12 SO STIPULATED:

13
 14 DATED: August 20, 2013

HADDAD & SHERWIN

15 /s/ Michael J. Haddad*
 16

MICHAEL J. HADDAD
 Attorneys for Plaintiff PETER DIXON

17
 18
 19 DATED: August 20, 2013

OFFICE OF THE CITY ATTORNEY OF
 OAKLAND

20
 21 /s/ Arlene M. Rosen*
 22

ARLENE M. ROSEN, Senior Deputy City Attorney
 Attorneys for Defendants CITY OF OAKLAND,
 23 BERNARD ORTIZ, STEVEN TORIBIO, PATRICK
 24 GERRANS, ROBERT GERRANS and R. GARCIA

25 //

26 //

27 //

1 DATED: August 20, 2013

BREMER WHYTE BROWN & O'MEARA LLP

2 /s/ Lance Pedersen*

LANCE PEDERSEN

3 Attorneys for Defendants PERSONAL
4 PROTECTIVE SERVICES, INC., DEMONT
5 MARROW, STANLEY TEETS, LADALE
6 SLOCUM, MEREDITH WILSON and RENE
7 GARCIA

8 *Mr. Haddad, Ms. Rosen and Mr. Pedersen provided their consent that this document be
9 electronically filed.

(PROPOSED) ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The settlement conference scheduled for September 12, 2013 at 9:30 a.m. is rescheduled for December 17, 2013 at 9:30 a.m..

Dated: August 21, 2103

